DORROH & KENDRICK

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October 8, 2007

Honorable James H. Welsh Commissioner of Conservation P.O. Box 94275 Baton Rouge, LA 70804-9275

Re: Justiss Oil Co., Inc. - Little Creek Field - Franklin #3

Wilcox C and D, Reservoir A, Sand Unit 138, LaSalle Parish, Louisiana

My File No. 2007-474

APPLICATION FOR PUBLIC HEARING

Dear Commissioner Welsh:

Application is hereby made on behalf of Justiss Oil Company., Inc, P.O. Box 2990, Jena, Louisiana 71342 for a public hearing to consider evidence relative to the issuance of an Order pertaining to the above captioned and the following matters:

- To grant an exception to the spacing provisions of Order #856-E as to permit the production of the "Justiss Oil Co., Inc.-Franklin #3 well from at a location 172 feet from the East line and 120 feet from the North line of the Southwest Quarter of the Northwest Quarter of Section 32, Township 9 North, Range 2 East, LaSalle Parish, Louisiana, which well is also located approximately 480 feet from the Poisso WXD RA SU 121 Cockerham No. 6 well located in the Northwest Quarter of the Northwest Quarter of said section.
- To designate the Justiss Oil Co., Inc.- Franklin #3 as an alternate unit well for WXC RA SU138, as defined by Order No. 856-E at said exceptional location, and to permit the operator to produce the unit allowable from the existing well on the unit, the proposed alternate unit well, or from any combination thereof, at its discretion, and to designate Justiss Oil Company, Inc. as the unit operator.
- 3) To designate the Justiss Oil Co., Inc.- Franklin #3 as the unit well for WXD RA SU138, as defined by Order No. 856-E at said exceptional location, and to designate Justiss Oil Company, Inc. as the unit operator.
- 4) To determine that the proposed location will effectively and efficiently drain portions of the reservoir which would not otherwise be drained by the existing well bore in WXC RA SU138 and in WXD RA SU138 absent the approval of the exceptional location.
- To consider any and all other matters which the Commissioner of Conservation may deem appropriate and necessary under the circumstances.
 - Order #856-E was promulgated by the Office of Conservation on April 14, 1986, effective January

1, 1986 establishing rules and regulations and creating drilling and producing units for the Little Creek Field of LaSalle Parish, Louisiana for the Wilcox A through H Zones, Reservoir A. The order provides that additional wells located in the Little Creek Field, within or outside any of the units created thereby, should not be drilled within 330 feet of any unit boundary or within 660 feet of any other well which has been permitted for, drilled to or completed in the same zone.

The Wilcox C Zone, Reservoir A was fully and completely defined by Order #856-E as that oil and gas or gas and condensate bearing interval encountered between the depths of 2438 feet and 2523 feet (electric log measurements) in the Louisiana-Hunt Petroleum Corporation - Taylor No. A-1 well, located in Section 25, Township 9 North, Range 1 East, LaSalle Parish, Louisiana.

The Wilcox D Zone, Reservoir A was fully and completely defined by Order #856-E as that oil and gas or gas and condensate bearing interval encountered between the depths of 2523 feet and 2620 feet (electric log measurements) in the Louisiana-Hunt Petroleum Corporation - Taylor No. A-1 well, located in Section 25, Township 9 North, Range 1 East, LaSalle Parish, Louisiana

The applicant attaches hereto a plat depicting the unit well at exceptional location for the WXC RA SU138 and the WXD RA SU138.

It is further noted that pursuant to Order No. 856-E-35 the Justiss Oil Company Franklin No. 3 was approved at this exceptional location for the WX B RA SU 138. Upon drilling, productive zones were encountered in WX C and WX D reservoirs, as well as the WX B reservoir. The well is currently producing from perforations 2654-2656' in the WX D.

In accordance with the Rules of Procedure, the applicant has made a diligent effort to obtain the names and addresses of all interested owners and represented parties to whom notice of this application should be sent and a list of such names is attached hereto.

The applicant shall cause a copy of the Legal Notice to be published in a newspaper of general circulation in LaSalle Parish, Louisiana and shall post a copy of the Legal Notice in a prominent place at the LaSalle Parish Courthouse, Jena, Louisiana.

A copy of this letter, the attached plat and list of interested owners and represented parties is also being sent to the District Manager of the Monroe District Office.

Enclosed is a Justiss Oil Co., Inc. check in the amount of \$1510.00 as payment of the required filing fees.

Yours Very Truly,

DORROH & KENDRICK, a PLC

BY:

STEVEN P. KENDRICK

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enclosures (plat and list of interested owners and represented parties)

xc: Office of Conservation

Monroe District Office

P.O. Drawer 1651

Monroe, LA 71201

xc: Interested Owners and Represented Parties

